



State of California

## **Respiratory Care Board**

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**Inquiry:** I would like to find out what the scope of practice is for a Certified Pulmonary Technician (CPT).

The individual in question provided me a copy of a certificate stating that he had successfully completed a NIOSH Approved Spirometry Testing and Respiratory Surveillance Training Program. According to the certificate, this course was approved for continuing education by the American Association of Occupational Health Nurses (AAOHN), and the certificate is valid until October 2003.

My question relates to this individual reviewing and evaluating medical evaluation questionnaire forms used for respiratory protection evaluations (comparable to the medical evaluation required by Title 8 California Code of Regulations, Subchapter 7. General Industry Safety Orders, Group 16., Control of Hazardous Substances, Article 107 Dust, Fumes, Mist, Vapors and Gases §5144. Respiratory Protection.)

The Respiratory Protection code listed above describes a physician or licensed health care professional (PLHCP) as "an individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows him or her to independently provide, or be delegated the responsibility to provide, some or all of the health care services required by subsection (e)."

Currently, this CPT reviews medical evaluations for an employer, and then provides written recommendations regarding the employees' abilities to use respirators for their work tasks.

In my conversation with the CPT, he stated that after his review of the medical questionnaire, he determines, based on any "yes" responses received on the evaluation, if the employee should see a physician for further evaluation. The CPT does not work under the direction of a physician, and only refers employees to see their own physician or an available occupational physician.

I have already checked with Cal-OSHA, and they recommended that I find out the scope of practice authorized by this person's certificate. I checked with the AAOHN and they do not have a scope of practice description available for this certificate. This CPT is employed in the state of California, and provides services to a Washington state employer.

**Response:** The certificate you described does not make the individual licensed to practice respiratory care in the state of California. It is merely a certificate indicating the individual has had specialized training to perform respiratory protection evaluations. If this board does not license that individual then they would not meet the requirements you described in the statute to perform these functions. I would recommend you contact our board staff to inquire if a license exists for this individual. There contact information is provided below:

Respiratory Care Board  
Toll free number: (866) 375-0386

Reference # 2002-C-30